

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Charles C. Redden, Jr. :
Debtor : BANKRUPTCY NO.: 18-12523-mdc

RESPONSE TO MOTION FOR RELIEF

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
- 3.-4. Neither admitted, nor Denied. Movant's averment contains facts in documents on record before the Court. The Debtor does not have the requisite knowledge to attest to the authenticity and veracity of said documents.
5. Admitted in part. The Debtor's Original plan does assume the agreement. In the event that the Debtor is due and owing post-petition payments, the Debtor intends to become current.
- 6.-7. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Date: 10/18/2018

Respectfully submitted,

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor